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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TOBIAS WALTON,

Plaintiff,

vs.

SCOTT DANIEL GRIMES; PILOT TRAVEL
CENTERS LLC; DOES I through XX,
inclusive; and ROE BUSINESS ENTITIES I
through XX, inclusive,

Defendants

CASE NO. 2:24-cv-00111-GMN-BNW

**STIPULATION AND PROPOSED ORDER
TO EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of record, that **the current discovery deadlines to be extended approximately ninety (90) days**, pursuant to Local Rule 26-1(b).

I.

DISCOVERY COMPLETED TO DATE

1. The parties have conducted the FRCP 26.1 Early Case Conference.
2. Plaintiff has produced his Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
3. Defendant has produced his Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a)
4. Defendants have propounded discovery to Plaintiff.
5. Plaintiff has responded to Defendants' discovery.

6. Deposition of Defendant Scott Grimes.

II.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Deposition of Plaintiff.

2. Deposition of Defendant Pilot Travel Centers LLC's 30(b)(6) witness(es).

3. Deposition(s) of Plaintiff's treating physicians.

4. Deposition of other percipient witnesses.

5. Initial expert disclosures.

6. Rebuttal expert disclosures.

7. Depositions of experts.

8. Issuing subpoenas to additional third-parties, including Plaintiff's medical providers (if any).

9. Additional written discovery (if necessary).

10. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III.

REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES

The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose other purpose of delay. Good cause exists for the following reasons:

After discussions amongst the parties the Plaintiff's first date of availability was in early November, just before the expiration of the current expert deadlines as well as the Thanksgiving holidays. Based on the foregoing, both Plaintiff and Defense counsel are requesting that the scheduling order dates including the initial expert disclosure date be extended by about 90 days in order to give the parties' experts time to obtain and review the deposition of the Plaintiff. Additionally, the parties have engaged in informal settlement discussions and would like time after the deposition of the Plaintiff to discuss settlement.

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Extension or Modification of The Discovery Plan and Scheduling Order.

Discovery Deadline	Current Deadline	Proposed Deadline
Initial Disclosures	March 8, 2024	March 8, 2024
Motion to Amend/Add Parties	November 26, 2024	February 24, 2025
Initial Expert Disclosures	November 26, 2024	February 24, 2025
All Rebuttal Expert Disclosures	December 30, 2024	March 31, 2025
Discovery Cut-Off Date	February 24, 2025	May 27, 2025
Dispositive Motions	March 26, 2025	June 24, 2025
Pretrial Order	April 25, 2025	July 24, 2025

The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

Dated this 24th day of October, 2024.

Dated this 24th day of October, 2024.

LADAH LAW FIRM

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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED this 10/25/2024